

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

FEB 13 2019

UNITED STATES OF AMERICA,

SEALED

PATRICK KEANEY  
Clerk, U.S. District Court  
By \_\_\_\_\_  
Deputy Clerk

*Plaintiff,*

v.

Case No. CR-19-10-Raw

**GUY COLESTON MCDONALD,  
JASMINE LEA MEIKLE,  
ROBBIE LEE HOLMES,  
HEATHER LEANN CHUCULATE, and  
JIMI DENISE DAY,**

*Defendants.*

SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**DRUG CONSPIRACY  
[21 U.S.C. § 846 & 21 U.S.C. § 841(a)(1)]**

Beginning in or about September 2017, the exact date being unknown to the Grand Jury, and continuing up to and including the date of the Superseding Indictment, within the Eastern District of Oklahoma and elsewhere, the Defendants, **GUY COLESTON MCDONALD, JASMINE LEA MEIKLE, ROBBIE LEE HOLMES, HEATHER LEANN CHUCULATE, and JIMI DENISE DAY**, did knowingly and intentionally conspire, confederate and agree with each other, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 21, United States Code, Section 846, as follows:

**OBJECTS OF THE CONSPIRACY**

The objects of the conspiracy were:

1. **GUY COLESTON MCDONALD, JASMINE LEA MEIKLE, ROBBIE LEE HOLMES, and JIMI DENISE DAY** conspired to possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); and
2. **HEATHER LEANN CHUCULATE** conspired to possess with intent to distribute and to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**FELON IN POSSESSION OF AMMUNITION**  
**[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]**

On or about February 13, 2018, within the Eastern District of Oklahoma, the defendant, **GUY COLESTON MCDONALD**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, ammunition and cartridge casings, to-wit: Eight (8) rounds of spent Hornady 9mm Luger ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT THREE**

**FELON IN POSSESSION OF FIREARM**  
**[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]**

On or about March 22, 2018, within the Eastern District of Oklahoma, the defendant, **GUY COLESTON MCDONALD**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, a firearm, to-wit: One (1) Taurus International Model 24/7 G2 .40 caliber semi-automatic pistol imported by Taurus International Miami, FL bearing serial number SGY23951, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT FOUR**

**FELON IN POSSESSION OF AMMUNITION**  
**[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]**

On or about May 29, 2018, within the Eastern District of Oklahoma, the defendant, **GUY COLESTON MCDONALD**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, ammunition, to-wit:

- Seven (7) rounds of Fiocchi .40 caliber ammunition, and
- One (1) round of Winchester .40 caliber ammunition,

which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT FIVE**

**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE**  
**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)]**

On or about May 29, 2018, within the Eastern District of Oklahoma, the defendant, **GUY COLESTON MCDONALD**, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT SIX**

**FELON IN POSSESSION OF AMMUNITION**  
**[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]**

On or about June 27, 2018, within the Eastern District of Oklahoma, the defendant, **GUY COLESTON MCDONALD**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, ammunition, to-wit:

- Twenty (20) rounds of Winchester .40 caliber ammunition, and
- One (1) round of Fiocchi .40 caliber ammunition,

which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**FORFEITURE ALLEGATION**  
**[21 U.S.C. § 853]**

The allegations contained in Count One of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants, **GUY COLESTON MCDONALD, JASMINE LEA MEIKLE, ROBBIE LEE HOLMES, HEATHER LEANN CHUCULATE, and JIMI DENISE DAY**, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense[s] and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s). The property to be forfeited includes, but is not limited to, the following:

- One (1) Spark Unmanned Aerial Vehicle (Drone) SN: 0ASDE9G1A100FG; and
- One (1) MacBook Air (Computer)

A TRUE BILL:

BRIAN J. KUESTER  
United States Attorney

  
SHANNON L. HENSON, OBA # 15905  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
FOREPERSON OF THE GRAND JURY